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VIA ECF

May 16, 2022


Honorable Colleen McMahon
United States District Court
Southern District
500 Pearl Street
New York, New York 10007

Re: U.S.A. v. Sanjay LaForest
21 Cr. 272 (CM)

Dear Judge McMahon:

As you are aware, I represent the aforementioned defendant, Sanjay LaForest. The bail conditions presently limit Mr. LaForest's travel to the Southern and Eastern Districts of New York and to New Jersey. I am respectfully requesting a modification of the release order. I am hereby requesting that Mr. LaForest be allowed to travel to Philadelphia tomorrow, May 17, 2022 to Wednesday May 18, 2022 for business meetings. He also needs to travel again to Florida for a design project from May 15, 2022 through June 12, 2022. Assistant United States Attorney Matthew Shahabian and his Pre-Trial Services Officer have no objection to the proposed modification.

Please contact me if you have any questions or concerns.

The travel noted above is approved. Sincerely, 

Brian Kaplan, Esq.

SO ORDERED


LORETTA A. PRESKA
UNITED STATES DISTRICT JUDGE

SO ORDERED:

Honorable Colleen McMahon

CC: AUSA Matthew Shahabian
(Via ECF)

5/16/22